

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

United States Courts
Southern District of Texas
FILED

February 07, 2023

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

INGRID NAYELI MUÑOZ

§
§
§
§

CRIMINAL NO.

L-23-CR-69

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNTS ONE - FOUR

On or about noted date, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

INGRID NAYELI MUÑOZ,

in connection with the acquisition of one and more of the firearms from the noted licensed firearms dealer, within the meaning of Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious oral and written statement to the noted licensed firearms dealer, which statement was intended and likely to deceive the dealer as to a fact material to the lawfulness of such acquisition of the said firearm(s) to the Defendant under Chapter 44 of Title 18, in that **INGRID NAYELI MUÑOZ** represented on a ATF Form 4473 that she was the actual buyer of the firearm(s) listed on the Form 4473, when in fact as **INGRID NAYELI MUÑOZ** knew, she was not the actual buyer of the firearm(s),

COUNT	DATE	MAKE & MODEL	CALIBER	SERIAL NUMBER	LICENSED FIREARM DEALER
ONE	October 21, 2021	Century Arms, VSKA rifle	7.62x39 mm	SV7093197	CCCF Tactical LLC

TWO	October 27, 2021	Radical Firearms LLC, RF-15 rifle	5.56 NATO	UT-02047	PT Armory LLC
TWO	October 27, 2021	Unbranded AR, UAR-C rifle	.223 caliber	UT-02047	PT Armory LLC
THREE	May 24, 2022	Century Arms, VSKA rifle	7.62x39mm	SV7107463	PT Armory LLC
FOUR	June 8, 2022	Sig Sauer, M400 rifle	5.56mm	20L155118	RAK Armory
FOUR	June 8, 2022	Israel Weapon Industries-IWI, z15 rifle	5.56mm	Z0010739	RAK Armory

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and Section 2.

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY



Michael Makens
Assistant United States Attorney

(Rev. 6-1-71)

CRIMINAL DOCKET L-23-CR-69

LAREDO DIVISION

NO. _____

FILE: 23-00341
INDICTMENT

MAG#: 23-00051
Filed: February 7, 2023

Judge: MGM

UNITED STATES OF AMERICA
VS.

ATTORNEYS:

ALAMDAR S. HAMDANI, USA
MICHAEL MAKENS, AUSA

INGRID NAYELI MUÑOZ

CHARGE:

Counts 1-4: False statements during purchase of a firearm [18 USC 922(a)(6), & 18 USC 2]

TOTAL COUNTS: 4

PENALTY:

Counts 1-4: 0-10 years of imprisonment, and/or a \$250,000 fine, \$100 Special Assessment, not more than a 3-year term of Supervised Release [per count]